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From: Khan, Annie (DPH)
Sent: Friday, April 22, 2011 1:44 PM
To: Kowalski, Craig (NFK)
Subject: RE: Predicate questions with answers

Haha. What kind of class is "Dymanic Earth"? Just Kidding

Chemistry is fun . .we get to make things explode. Esp. with Drug lab . . we got the good stuff.

12b. 100+ times and Courts: Federal- Boston & Worcester; Essex, Norfolk, Suffolk, Plymouth, Middlesex, Bristol & Barnstable Superior; various District courts.

Keep me posted.

Annie

-----Original Message-----

From: Kowalski, Craig (NFK)
Sent: Friday, April 22, 2011 1:13 PM
To: Khan, Annie (DPH)
Subject: RE: Predicate questions with answers

Good changes.

I added a 12a and 12b:

- 12) Approximately how many times have you had occasion to test for a controlled substance? 10s of thousands
- 12a) Have you testified in court before regarding analyses you have conducted? Yes.
- 12b) How many times and in what courts?

I don't know your answer to 12b, but I'm assuming it's good.

As for using the second chemist, as a layperson it seems like everything is covered in your testimony (or at least enough for the certifications to come in and to prove that the substances are coke, heroin and OC). I'll play it by ear. If the defense atty for some reason knows what he's doing (but I don't think he does) and makes things difficult I'll call Dan and ask Dan what he did.

Thanks again for all your help. Scientific things are not my strong suit. I took "Dynamic Earth" in college to fulfill my science requirements rather than chemistry, physics or biology.

Craig

Craig F. Kowalski
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-----Original Message-----

From: Khan, Annie (DPH)
Sent: Friday, April 22, 2011 12:14 PM
To: Kowalski, Craig (NFK)
Subject: RE: Predicate questions with answers

Welcome. Bad habit of writing in red when I do corrective action on chemist's work for QC/QA.

See attachment for an updated version of the predicate questions: I change the wording of question # 35 and eliminated what was question # 37. I edited these to avoid potential problems from the d/c.

Dan was the confirmatory chemist. His role was to compare the unknown sample to a known standard. We perform confirmatory test because we require reviewable data. I can state that because I am trained in GC/MS (confirmatory test), I can review the documents form my opinion to those findings. It has worked in my previous cases.

We leave that decision up to the ADA, if d/c and the judge has no objections, I can testify to everything. You call the shots. I would suggest to have me testify to everything and see how it goes. But I will still bring Dan just incase. Worst case, he is not needed and I buy him donuts. Haha.

Have a nice weekend as well.

Annie

-----Original Message-----

From: Kowalski, Craig (NFK)
Sent: Friday, April 22, 2011 9:00 AM
To: Khan, Annie (DPH)
Subject: RE: Predicate questions with answers

Annie,

Well! Thank you, thank you, thank you! I wish every witness would do the same and send me back their answers in red.

After reading through that, do I really need Dan? Can you explain to me his role?

Have a great weekend and see you next week. I'll contact you after I get started on Tuesday to confirm the Thursday at 9 time.

Best, Craig

Craig F. Kowalski
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-----Original Message-----

From: Khan, Annie (DPH)
Sent: Thursday, April 21, 2011 10:49 PM
To: Kowalski, Craig (NFK)
Subject: Predicate questions with answers

See attachment for the predicate question with my answers.

Avoid questions that deal with: accreditation, publications and external training.

Additional questions that may help build creditability(at least in my experience):

Have you ever testified before?
If so, approximately how many times and which courts?

Hope this helps. Let me know if I need to clarify or expand on any particular topics.

PS: Debi and George knows how to find me.

Annie